

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

Leo Guy, Ryan Tanner, Magaly Granados,
Kerry Lamons, Tammy Rano, Vicki Will,
and Jennifer White, individually and on
behalf all others similarly situated,

Plaintiffs,

v.

CONVERGENT OUTSOURCING, INC.,

Defendant.

Case No. 2:22-cv-01558-MJP

**DECLARATION OF MELISSA M. BILANCINI REGARDING IMPLEMENTATION OF
CAFA NOTICE**

I, Melissa M. Bilancini, hereby declare and state as follows:

1. My name is Melissa M. Bilancini. I am over the age of 25 and I have personal knowledge of the matters set forth herein, and I believe them to be true and correct.
2. I am an associate with Baker & Hostetler LLP (“BakerHostetler”), the law firm representing Defendant Convergent Outsourcing, Inc. in this matter.
3. The facts in this Declaration are based on what I personally know, as well as information provided to me in the ordinary course of business by my colleagues at BakerHostetler.
4. At BakerHostetler’s direction, the settlement administrator Epiq Class Action and Claims Solutions, Inc. (“Epiq”) identified 57 federal and state officials to receive CAFA notice, including the Attorney General of the United States and the Attorneys General of each of the 50 states, the District of Columbia, and the United States Territories.
5. On November 9, 2023, BakerHostetler sent 57 CAFA Notice Packages (“Notice”). The Notice was mailed via USPS Certified Mail to 55 officials (the Attorneys General of 49 states,

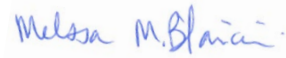
the District of Columbia, and the United States Territories). As per the direction of the Office of the Nevada Attorney General, the Notice was sent to the Nevada Attorney General electronically via email. The Notice was also sent via United Parcel Service (“UPS”) to the Attorney General of the United States.

6. The Notice included a Cover Letter, which provided notice of the proposed Settlement of the above-captioned case. The Cover Letter, which includes the CAFA Notice Service List, is included as **Attachment 1**.

7. Each Notice also included a CD containing the following items:

- a. 28 U.S.C. § 1715(b)(1) – Complaints and Amended Complaints
 - i. The original complaints for each of the 8 cases that were consolidated in the United States District Court for the Western District of Washington and the Consolidated Amended Class Action Complaint, filed February 10, 2023, as well as all attachments thereto.
- b. 28 U.S.C. § 1715(b)(3) – Notification to Class Members:
 - i. Claim form (Exhibit A to Settlement Agreement);
 - ii. Long Notice (Exhibit B to Settlement Agreement); and
 - iii. Summary Notice (Exhibit C to Settlement Agreement).
- c. 28 U.S.C. § 1715(b)(4) – Class Action Settlement Agreement:
 - i. The Settlement Agreement and exhibits thereto; and
 - ii. Memorandum in Support of Plaintiff’s Unopposed Motion to Preliminarily Approve Class Settlement.
- d. 28 U.S.C. § 1715(b)(7) – Estimate of Class Members:
 - i. A geographic location analysis of potential class members.

I declare under penalty of perjury that the foregoing is true and correct. Executed July 12, 2024.

A handwritten signature in blue ink that reads "Melissa M. Bilancini".

Melissa M. Bilancini